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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	No. CR 11-00422-01 LHK
)	
Plaintiff,)	STIPULATION AND PROPOSED
)	DISCOVERY PROTECTIVE ORDER
v.)	BETWEEN THE UNITED STATES AND
)	DEFENDANT
EDWARD G. KLUIJ)	
)	
Defendant.)	

Defendant Edward G. Kluij and the United States of America, by and through their counsel of record, hereby agree and stipulate as follows:

1. This Court may enter protective orders pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, and its general supervisory powers.
2. This Order pertains to all discovery provided to or made available to defense counsel as part of discovery in the above-cited case.
3. The discovery and information therein may only be used in connection with the litigation of this case and for no other purpose. Defense counsel will return the discovery to the government, or certify that has been shredded at the conclusion of the case.

6. Defense counsel will store the discovery in a secure place and will exercise due diligence to ensure that it is not disclosed to third persons in violation of this agreement. Similarly, if defense counsel makes or causes to be made, copies of any of the discovery, defense counsel will exercise due diligence to maintain control of said copies and to ensure that said copies are stored in a manner to safeguard against the inappropriate use of said materials.

/s/
DENNIS ROBERTS, ESQ.
Attorney for Edward G. Kluij

ORDER

Based upon the stipulation of the parties, and for good cause shown, the Court
HEREBY ORDERS that the terms of the stipulation between the United States and all
defendants in this case pertaining to the discovery in this case be imposed.
IT IS SO ORDERED.

DATED: 8/16/2011



PAUL S. GREWAL
UNITED STATES MAGISTRATE JUDGE